

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** : Case No.: 18-14828-amc  
**Marcia J. Culbert** : Chapter 13  
Debtor(s) : Judge Ashely M. Chan  
\*  
  
**The Bank of New York Mellon f/k/a The** : Date and Time of Hearing  
**Bank of New York, as successor in** : Place of Hearing  
**interest to JPMorgan Chase Bank,** : January 8, 2019 at 11:00 a.m.  
**National Association f/k/a JPMorgan** :  
**Chase Bank, as Trustee for GSMPS** : U.S. Bankruptcy Court  
**Mortgage Loan Trust 2003-1** : 900 Market Street, Courtroom #4  
  
**Movant,** : Philadelphia, PA, 19107  
vs :  
\* \* \* \* \*

**Marcia J. Culbert**

William C. Miller

## **Respondents.**

**NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE WITH 30 DAY  
WAIVER**

The Bank of New York Mellon f/k/a The Bank of New York, as successor in interest to JPMorgan Chase Bank, National Association f/k/a JPMorgan Chase Bank, as Trustee for GSMPS Mortgage Loan Trust 2003-1 has filed a Motion for Relief from Automatic Stay. The Creditor hereby waives the right under 11 U.S.C § 362(e) to a hearing on this motion within thirty (30) days of the date it is filed.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before December 21, 2018, you or your attorney must do **ALL** of the following:
  - A. File an answer explaining your position at:

**Clerk, U.S. Bankruptcy Court**  
U.S. Bankruptcy Court  
900 Market Street  
Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee  
Office of the U.S. Trustee  
833 Chestnut Street, Suite 500  
Philadelphia, PA 19107

William C. Miller, Esq.  
Chapter 13 Trustee  
P.O. Box 1229  
Reading, PA 19105  
ecfmail@fredreiglech13.com

Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan on January 8, 2019 at 11:00 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #5, Philadelphia, PA, 19107.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: 12/6/18

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Motion, Response Deadline, and Hearing Date regarding Motion for Relief from Automatic Stay with 30 day waiver was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,  
Philadelphia, PA 19107

William C. Miller, Esq., Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229,  
Philadelphia, PA 19105

Kenneth E. West, Attorney for Marcia J. Culbert, West and Associates, 830 Lansdowne Avenue, Drexel Hill, PA 19026, dwabkty@aol.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on December 6, 2018:

Marcia J. Culbert, 406 Printz Avenue, Essington, PA 19029-1313

Marcia J. Culbert, 406 Printz Avenue, Essington, PA 19029

DATE: 12/6/18

/s/ Karina Velter

Karina Velter, Esquire (94781)  
Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611  
Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Karina  
Velter.  
Contact email is kvelter@manleydeas.com